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OCT 31 2007

Western Oregon Plan Revisions Office P.O. Box 2965 Portland, OR 97208

To Whom It May Concern:

The alternative revisions call for a three-fold increase in logging in western Oregon. While logging interests and local governments, which share in the proceeds of timber sales, believe the revisions restore "the rightful primacy of logging on these tracts," reputable organizations without a financial interest oppose the revisions.

Scientists and environmental groups argue that the revisions change the priorities established in the NWFP and will harm species dependent on old-growth areas for survival and threaten salmon stocks. Since the owl recovery plan is linked to the NWFP, scientists fear the revisions will dismantle habitat protections included in the plan. For example, 113 scientists sent a letter to Department of Interior Secretary Dirk Kempthorne on Oct. 2 requesting he withdraw the revisions to the recovery plan and "assemble a team of scientists to redraft a recovery plan based on best available science."

In addition, the scientists requested that the participation by Bush administration officials in the rejection of the recovery plan be reviewed. Kempthorne commissioned a review of Endangered Species Act decisions as part of reforms to improve how FWS handles these decisions. The need for the review was sparked by the improper influence of Julie A. MacDonald, a former deputy assistant at FWS, in how certain decisions were made. (See The Watcher article of May 15.) MacDonald was part of the Washington [DC] Oversight Committee that rejected the 2006 draft recovery plan.

According to NCCSP testimony before the House Committee on Natural Resources May 9, this Oversight Committee ordered the group to develop an alternative to their conservation-based plan, one that did not rely on a network of forest habitat reserves. The new alternative "was not based on sound science but was designed to give the Forest Service and the BLM the discretion to exempt public forests from the NWFP."

The Oversight Committee also ordered the group to change the scientific studies used as the basis of the recovery plan and to "de-link the recovery plan from the Northwest Forest Plan," according to the testimony.

The result of the process described above is BLM's Draft EIS. In addition to increasing logging in western Oregon generally, the plan would double the area of old-growth forests allowed to be logged, according to a summary of the draft written by NCCSP. It also eliminates the forest reserve approach to protecting habitat and designates logging as

the primary value of BLM land, according to Oregon Heritage Forests (OHF), an association of conservation groups. The plan would also allow logging closer to rivers and streams, potentially affecting drinking water as well as sedimentation and water temperature, both of which affect native fish stocks. "Shockingly, the BLM claims minimal or no effect on fish, floods and sediment despite a massive increase in clearcut logging," OHF writes on its website.

I oppose the revisions to the plan and instead advocate development of a plan based on preservation of old-growth forests, a decrease in overall logging, improvement in water quality, preservation of threatened species, no new road building in forested areas, and an increase in non-logging uses in BLM jurisdictions.

Sincerely,

Clark O. Anderson

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